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Before the
Federal Communications Commission
Washington, D.C. 20554

In re the Matter of

Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them

PR DOCKET NO. 92-235

To: The Commission

COMMENTS OF

SPECTRUM RESOURCES, INC.

P.O. BOX 1141

ST. CHARLES, MO 63302-1141

314-946-9980

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INTRODUCTION

SPECTRUM RESOURCES, INC. is an independent communications consulting firm supplying services to Public Safety, Utility and other Commission licensees. In addition, SRI is a licensee in the current Business Radio Service.

RESPONSES

It is our opinion that the overall NPRM is well done, and will, in future years, serve many of the needs of the Land Mobile community. We do, however, have some questions, comments and reservations.

1. We feel that the schedule of conversion to narrow bandwidth is reasonable and will allow licensees time to replace or modify existing equipment.

2. The reduction from 19 Services to 3 Services is a good step forward. The existing method of interservice sharing is slow, cumbersome and expensive (multiple coordination fees). We have found many channels in some Services to be under utilized due to lack of need by that Service while channels in other Services were heavily used. By removing the regulatory fence between Services, additional channel capacity will be made available to all.

3. Allowing any existing frequency coordinating agency to coordinate all channels in their respective pool is excellent. This will finally solve the problems of monopoly coordination, a sore spot with the Land Mobile community.

   With the advent of low cost, high speed data modems, it will not be difficult or expensive for coordinators to search the data bases of other coordinators and update each other on coordination actions taken. The Commission should, either as a part of this Rule Making or separately, require all coordinators to make their data base information available to

all other coordinators and require cooperation between coordinators. After all, shouldn't coordinators be capable of COORDINATION?

4. We do have a problem with the ERP/HAAT Tables included in the Rules, especially in the 150-170MHz and 450-470MHz Bands. This will cause a hardship to many licensees. It does not take into consideration such items as antenna pattern or downtilt. Also, the low levels of ERP will cause problems in mountainous areas due to the large losses that can be encountered by shadowing.

   A much better method would be to define carrier to potential interference ratios at the boundary of the Service area, or simply define a maximum signal level at the Service area boundary.

5. We feel that, at least initially, the frequency stability parameters are to stringent. The cost of such oscillators is quite high and would be a burden. An alternative suggestion would be one (1) part per million for all base and repeater stations regardless of power and service during the transition period with 0.5ppm to be required after the dates listed in 88.433. There is no logical reason for high power stations to have reduced frequency stability requirements. If anything, these are the stations that should be held to closer tolerances due to their potential for interference.

6. We question the technical viability of 5KHz and 6.25KHz channel spacing. Is it the intention of this NPRM to mandate

[redacted]

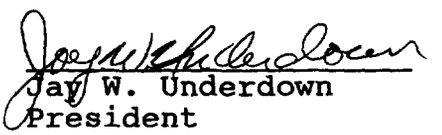
8. We suggest that some of the shared channels be limited to an ERP level of 25-50 watts with a maximum antenna height of 50-75 feet. This will allow these channels to be reused at closer spacings. Small radio users could license on these frequencies thus reducing the loading on other channels with higher power and higher antenna limitations.

CONCLUSION

In conclusion, although we feel that reallocation of existing unused spectrum would have been a more viable method of increasing channel capacity, we feel that narrow banding can also be of benefit. If our questions can be adequately answered and the needs of the users adequately addressed, we support this NPRM.

Respectfully Submitted,

SPECTRUM RESOURCES, INC.

By: 

Jay W. Underdown
President
P.O. Box 1141
St. Charles, MO 63302

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